

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
v.) CR # 04-30046-MAP
ALBERT INNARELLI, *et al.*,)
)
Defendants)

Defendant, Kathryn Zepka's Motion to Suspend Trial Schedule

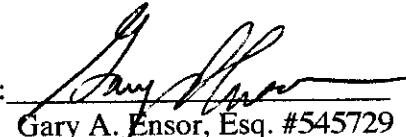
NOW COMES the Defendant, Kathryn Zepka, by counsel in the above-captioned action and moves that this Honorable Court orders the suspension of trial from Friday, May 12, 2006 to Thursday, May 18, 2006, inclusive.

AS GROUNDS HEREFOR counsel for Defendant Zepka states that today he received trial order dated February 13, 2006 to commence trial on May 8, 2006 at 10:00am and day-to-day thereafter. Prior to receiving said order, however, counsel and his spouse were reserved to be in Ft. Worth, TX departing from Hartford, CT (BDL) early morning on May 12th then returning from Dallas, TX (DFW) late evening on May 18th. Counsel's three-fold purpose away from the Commonwealth during this time is for a long-awaited spousal trip, to tour a college campus at which counsel's stepson is a recruited prospective athlete and to conduct business in Ft. Worth, TX with officers and employees of various companies from throughout the United States. Neither the trip nor business to be conducted by counsel can be postponed because the trip has been prepaid and the business involves the necessary presence in Texas of other individuals both nationally and internationally. This motion is filed in good faith without intent to unduly

delay or obstruct these proceedings.

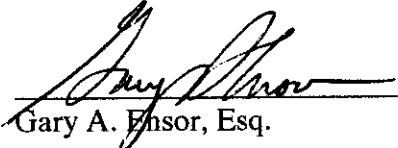
Respectfully Submitted
Defendant, Kathryn Zepka

Date: February 14, 2006

By: 
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CERTIFICATE OF SERVICE

The undersigned hereby certifies under the penalty of perjury that a copy of the foregoing Defendant Kathryn Zepka's Motion to Suspend Trial Schedule was served upon the United States of America by facsimile and first class mail to its Assistant United States Attorney, William Welch, at the Office of the United States Attorney, Courthouse, 1550 Main Street, Springfield, MA 01103 on this 14th day of February, 2006.


Gary A. Ensor, Esq.